

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOE DASILVA, JR.,

Plaintiff,

Civil No. 20-11358

v.

Honorable Mark A. Goldsmith

CHRISTINE WORMUTH,
Secretary of the Army, and MARTIN
POTTER, in his individual capacity,

Defendants.

DEFENDANT WORMUTH'S EXHIBIT LIST

Defendant Christine Wormuth, by Dawn N. Ison, United States Attorney for the Eastern District of Michigan, and Benjamin A. Anchill, Assistant United States Attorney, identifies the following exhibits that she will or may introduce at trial in this case.

1. Documents pertaining to the EEO complaint that Plaintiff filed in 2017 (Case No. ARDETROIT17FEB00046), including the Counselor's Report and Negotiated Settlement Agreement
2. Report of Investigation and Investigative/Complaint File for the EEO complaint that Plaintiff filed in 2018 (ARDETROIT18MAY01583), including the ALJ's decision.

3. Report of Investigation and Investigative/Complaint File for the SHARP complaint filed by Plaintiff in 2018
4. Plaintiff's personnel file
5. Base System Civilian Evaluation Reports for Plaintiff
6. Memorandum for Martin Potter dated June 4, 2018
7. Memorandum for Record dated March 7, 2017
8. Memorandum for Record dated September 17, 2017
9. Memorandum dated September 1, 2015
10. Documents and training materials pertaining to training that occurred following Plaintiff's SHARP complaint
11. Applicable policies and procedures governing civilian employment in the United States Army, including Regulation 690-12; EEO Policy; Anti-Harassment Policy for the Workforce; Standard Operating Procedure 18-001; Policy Memorandum #07, Sexual Harassment/Assault Response and Prevention; Negotiated Labor Management Agreement
12. Documents pertaining to Plaintiff's application for a Captain position in September 2019
13. All records maintained by the Army concerning Plaintiff's employment.

14. SHARP and EEO training materials
15. Audio recording of Plaintiff's meeting with Arthur Young
16. Documents received from third parties, including Plaintiff's medical providers, Social Security Administration, Plaintiff's prior employers, Worker's Compensation file
17. Documents produced by Plaintiff

Discovery is ongoing. Defendant reserves the right to amend this exhibit list as the case progresses.

Respectfully submitted,

DAWN N. ISON
United States Attorney

/s/ Benjamin A. Anchill
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Dated: September 7, 2022

CERTIFICATION OF SERVICE

I certify that on September 7, 2022, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the ECF participants in this case.

s/Benjamin A. Anchill
BENJAMIN A. ANCHILL
Assistant U.S. Attorney